

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

MATCH GROUP, INC., a corporation, and
MATCH GROUP, LLC, formerly known as
MATCH.COM, LLC, a limited liability
company,

Defendants.

Case No. 3:19-cv-02281-K

**JOINT MOTION FOR ENTRY OF STIPULATIONS REGARDING DISCOVERY OF
ELECTRONICALLY STORED INFORMATION AND CONFIDENTIAL MATERIALS**

Plaintiff Federal Trade Commission and Defendants Match Group, Inc. and Match Group, LLC (collectively, the “Parties”) jointly move the Court for entry of the Stipulated Order Regarding Discovery of Electronically Stored Information, Dkt. 126 (the “ESI Order”), and Stipulated Protective Order Regarding Confidential Materials, Dkt. 127 (the “Protective Order”) (the “Joint Motion”).

The Parties have agreed to the terms of the ESI Order and Protective Order and believe that good cause exists for their entry. The ESI Order would govern discovery of electronically stored information as a supplement to the Federal Rules of Civil Procedure and any other applicable orders and rules. *See* Dkt. 126 ¶ 1. The Protective Order would govern the treatment of confidential materials, but the Parties acknowledge that the Protective Order would not confer blanket protections on all disclosures and would extend only to the information or items that are entitled to confidential treatment under applicable legal principles. *See* Dkt. 127 ¶ 1. The Parties further acknowledge that the Protective Order would not automatically entitle them to file

confidential information under seal, as Local Civil Rule 79.3 sets forth the procedures that must be followed and the standards that would be applied. *See id.*

Accordingly, the Parties respectfully request that the Court enter the ESI Order and Protective Order.

Dated: August 25, 2022

/s/ Angela C. Zambrano

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Respectfully submitted,

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